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**MEMO ENDORSED** 

December 15, 2022

Franklin A. Rothman Jeremy Schneider Robert A. Soloway David Stern

Rachel Perillo

## By ECF

The Honorable Valerie E. Caproni United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Terrence Williams

21 Cr. 603 (VEC)

Dear Judge Caproni:

I represent Terrence Williams, the defendant in the above-referenced matter. Mr. Williams is scheduled to be sentenced on April 4, 2023. The current deadline for final disclosure of the Presentence Report ("PSR") is December 19. Due to my ongoing trial obligations in the matter of *United States v. Sayfullo Saipov*, 17 Cr. 722 (VSB), counsel previously requested an extension to December 1 to submit Mr. Williams' PSR objections, which the Court granted. *See* Dkt. 617. However, more time is needed to complete our objections. Accordingly, without objection from the government, by AUSA Ryan Finkel, and Probation Officer Christopher Paragano, I respectfully request a second extension that would permit Mr. Williams to submit PSR objections to Probation by January 13, 2023, as well as a corresponding adjournment of the deadline for final disclosure of the PSR.

If the Court has any questions regarding this application please do not hesitate to contact me.

Respectfully submitted,

/s/ David Stern

cc: AUSA Ryan Finkel, AUSA Daniel Nessim (by ECF) USPO Christopher Paragano (by Email)

Application GRANTED.

SO ORDERED.

12/15/2022

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE